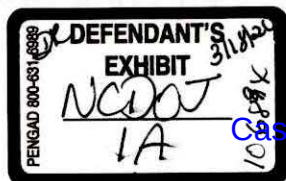


Defendant North Carolina Department of Justice Designees for Modified Deposition Topics Pursuant to the Court's Order dated 20 February 2024

	Plaintiff's Original Deposition Topic	Court ruling (All page references to DE-87)	Restated topic following Court order	Designee
2	The creation, adoption, amendment, and implementation of NC DOJ's personnel manual, including any policies or directives relating to equal employment opportunity policy/anti-discrimination policy/anti-harassment policy, including the individuals involved, the dates the policy was created, adopted, amended or implemented, and the process for amending or revising the policy during the period January 1, 201[7], to present.	Adopted NC DOJ's proposed modification (Page 5) Limited the time period to May to October 2020 (Page 9)	NC DOJ's policies or directives relating to equal employment opportunity and anti-discrimination that were in effect during the period of May 2020 to October 2020, including the persons involved with creating those policies or directives and the dates the policies or directives were created, adopted, or implemented.	Kristen Bierline
3	Policies, procedures, and practices for enforcing NC DOJ's anti-discrimination/anti-harassment/anti-retaliation policies, including the process for reporting, investigating, and resolving complaints of discrimination, harassment, or retaliation during the period January 1, 201[7], to present.	Adopted NC DOJ's proposed modification (Page 5) Limited the time period to May to October 2020 (Page 9)	NC DOJ's process for enforcement of policies or directives relating to anti-discrimination during the period of May 2020 to October 2020.	Kristen Bierline
4	The number, name of grievance, and conduct of grievance hearings conducted by Defendant NC DOJ in general, including the one at issue in this matter, including the recording, transcribing, notetaking, deliberations both before and after the	Limited the time period to May to October 2020 with regard to policies, procedures, training (Page 9)	The number, name of grievance, and conduct of grievance hearings conducted by Defendant NCDOJ arising out of the Public Safety Section, including the one at issue in this	Kristen Bierline (as to policies and procedures)



	hearings, witness selection, communications with the chief of staff and Attorney General during the period January 1, 201[7] to present.	Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	<p>matter, during the period January 1, 2017 to October 2020, including the recording, transcribing, notetaking, deliberations both before and after the hearings, witness selection, communications with the chief of staff and Attorney General.</p> <p>The policies and procedures that applied to grievance hearings within the Public Safety Section of NC DOJ during the period of May to October 2020.</p>	Danielle Elder (as to Ms. Calloway-Durham's grievance hearing)
5	NCDOJ's policies and procedures for recruiting and hiring employees in effect since January 1, 2017, including how and where NCDOJ advertises vacancies; how NCDOJ selects candidates to interview or hire; what questions NCDOJ asks in interviews; what other methods NCDOJ uses to assess candidates; and what records NCDOJ keeps about successful and unsuccessful applicants during the period January 1, 201[7], to present.	Limited the time period to May to October 2020 (Page 9)	NCDOJ's policies and procedures for recruiting and hiring employees in effect from May to October 2020, including how and where NCDOJ advertises vacancies; how NCDOJ selects candidates to interview or hire; what questions NCDOJ asks in interviews; what other methods NCDOJ uses to assess candidates; and what records NCDOJ keeps about successful and unsuccessful applicants.	Kristen Bierline
6	Information about Attorney classifications including job descriptions and the minimum, required, or desirable	Limited the time period to May to October 2020 (Page 9)	Information about Attorney classifications including job descriptions and the minimum,	Kristen Bierline

	qualifications during the period January 1, 201[7], to present.		required, or desirable qualifications during the period of May to October 2020.	
7	Information about the reasons for each personnel change for each position listed on Defendants' Bates No. 2048-2060 (also Exhibit B to Plaintiff's Third set of discovery requests) and the process for the approval of the same.	Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	Information about the reasons for each personnel change for each position listed on Defendants' Bates No. 2048-2060 (also Exhibit B to Plaintiff's Third set of discovery requests) that was in the Public Safety Section and occurred from January 1, 2017 to October 2020, and the process for the approval of the same.	Leslie Dismukes
8	NCDOJ's policies, procedures, and practices for conducting performance reviews or compensation reviews since January 1, 201[7], changes to such policies, procedures, and practices since January 1, 201[7], and the decision makers involved in performance review or compensation reviews, including those who provided input and those who had final authority.	Limited the time period to May to October 2020 (Page 9)	NCDOJ's policies, procedures, and practices for conducting performance reviews or compensation reviews from May to October 2020, changes to such policies, procedures, and practices from May to October 2020, and the decision makers involved in performance review or compensation reviews during that time period, including those who provided input and those who had final authority.	Kris Joyce
9	The compensation system, including pay scales, pay grades, or pay steps, if any, in effect January 1, 201[7], to present for all	Limited the time period to May to October 2020 (Page 9)	The compensation system, including pay scales, pay grades, or pay steps, if any, in effect	Kristen Bierline

	attorney positions and the procedure or method used to determine an employee's starting salary or wage, bonus, or incentive compensation, merit increases, and other monetary compensation.		from May to October 2020 for all attorney positions and the procedure or method used to determine an employee's starting salary or wage, bonus, or incentive compensation, merit increases, and other monetary compensation.	
10	Training that NCDOJ has provided its officers, directors, managers, supervisors, and employees regarding how to handle, report, process, or otherwise address claims of discrimination, harassment, or retaliation, the materials provided to attendees during any training, the frequency and timing of such training, and the staff involved in providing such training since January 1, 201[7].	Adopted NC DOJ's proposed modification (Page 5) Limited the time period to May to October 2020 (Page 9)	The training that NCDOJ provided its officers, directors, managers, supervisors, and employees about how to handle, report, process, or otherwise address claims of discrimination, harassment, or retaliation, the materials provided to attendees during any training, the frequency and timing of such training, and the staff involved in providing such training from May to October 2020. (Joyce)	Kris Joyce
11	Formal or informal complaints of discrimination on the basis of sex or race made by any employee since January 1, 201[7], including formal and informal internal complaints, complaints filed with the Equal Employment Opportunity Commission (EEOC), the Office of	Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	Formal or informal complaints of discrimination on the basis of sex or race made by any employee in the Public Safety Section between January 1, 2017 and October 2020, including formal and informal	Leslie Dismukes

	Administrative Hearings, or any other entity, and lawsuits.		internal complaints, complaints filed with the Equal Employment Opportunity Commission (EEOC), the Office of Administrative Hearings, or any other entity, and lawsuits.	
13	NCDOJ's record-keeping and document retention policies, procedures, and practices.	Limited the time period to May to October 2020 (Page 10)	NC DOJ's record-keeping and document retention policies, procedures, and practices that were in effect between May to October 2020.	Tiffany Lucas
15	The source and substance of the "awareness" of Josh Stein both as it specifically pertains to the matters in this litigation described in your Answer (DE52, ¶10) and other personnel decisions made by the NCDOJ described in your Answer (DE52, ¶10).	Adopted NC DOJ's proposed modification (Page 7) Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	The Attorney General's awareness of the promotion decision at issue in this case.	Seth Dearmin
16	The facts related to the participating of Cassell, Defendants Dismukes and Elder described in your Answer (DE52, ¶11) and the conduct of grievance hearings generally by the NCDOJ.	Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	The facts related to the participating of Cassell, Defendants Dismukes and Elder described in your Answer (DE52, ¶11) and the conduct of grievance hearings arising out of the Public Safety Section from January 1, 2017 to October 2020.	Kristen Bierline (general policies and procedures) Danielle Elder (role of Ms. Cassell, Ms. Dismukes, and Ms.

				Elder at Plaintiff's grievance hearing)
17	The "reorganization efforts" undertaken by NCDOJ referenced in your Answer (DE52, ¶29) and the "realignments" and other position changes, including additions and attritions, which have occurred since January 1, 201[7].	Limited to the Public Safety Section and the time period of Jan. 1, 2017 to Oct. 2020 (Page 9)	The "reorganization efforts" undertaken by NCDOJ referenced in your Answer (DE52, ¶29) and the "realignments" and other position changes, including additions and attritions, which have occurred in connection with the Public Safety Section from January 1, 2017 to October 2020.	Leslie Dismukes